



Better Developments

Airspace Investments Limited
Supplier Code of Conduct

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Introduction

The purpose of this Supplier Code of Conduct is to articulate Airspace Investments Limited's and its subsidiaries (Airspace) expectations and requirements for all suppliers. As the ultimate holding company of several leading property investment, development and management companies, Airspace are committed to fostering socially responsible and sustainable business relationships. This Code is designed to help suppliers align with Airspace's core values and mission, which focus on protecting human rights and promoting strong environmental and social practices both within Airspace's own organisations and throughout their various supply chains.

1. Scope and Applicability

This Code applies to all suppliers engaged to supply goods or services to or on behalf of Airspace. Please note that references to Airspace throughout this Code includes reference to its subsidiaries. Suppliers are required to ensure that their employees, contractors, consultants, and second-tier suppliers are advised of and comply with this Code.

2. Airspace Commitments

Airspace recognises that it must lead by example with regard to respect for human rights and implementing responsible business practices.

Additionally, this Code was developed in compliance with relevant legislation and best practice frameworks, including but not limited to:

- EU Taxonomy Minimum Safeguards
- The Criminal Law (Human Trafficking) Act 2008 (Amendment) 2013
- The UN Guiding Principles on Business and Human Rights
- The International Bill of Human Rights
- The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- The OECD's Guidelines for Multinationals.

Airspace is committed to supporting suppliers in implementing this Code through facilitating knowledge sharing and best practice exchange. Airspace is committed to working collaboratively with suppliers, as far as is reasonably practicable, to support or facilitate remediation in the event of any environmental or human rights violations.

3. Supplier Commitments

All Airspace suppliers are expected to adhere to the provisions of this Code. Receipt of this Code by a supplier or their authorised representative constitutes acceptance of the Code, as does receipt of Airspace's appointment letter or standard addendum to building contracts.

Suppliers are required to make Airspace aware in instances where:

- Their organisation is unable to comply with this Code. In such instances, suppliers must inform Airspace of when they will be in a position to comply

- Changes to their organisation occur, which could, or do prohibit them from complying with this Code
- Their organisation receives any legally binding convictions in relation to labour law, human rights, corruption or bribery, tax evasion, environmental or competition law violations.

Airspace reserves the right to terminate its relationship with suppliers that fail to comply.

The key principles of this Code are detailed below.

3.1 Human Rights

Suppliers shall:

- Respect and act in accordance with human rights as defined by a recognised human rights instrument, such as:
 - The UN Guiding Principles on Business and Human Rights
 - The International Bill of Human Rights
 - The International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
 - The OECD's Guidelines for Multinationals
- Prohibit all forms of Modern Slavery within their organisation and within their supply chain in accordance with The Criminal Law (Human Trafficking) Act 2008 (Amendment) 2013. This includes forced labour, child labour, debt bondage, and human trafficking
- Prohibit any form of discrimination based on race, religion, gender, age, disability, sexual orientation, or any other protected characteristic
- Ensure equal opportunity in employment practices and that all employees receive fair wages
- Ensure safe and healthy working conditions, including full compliance with the provisions of the Safety, Health and Welfare at Work Act 2005 and any subsequent Health and Safety Acts
- Promote diversity and inclusion in the workplace.

3.2 Ethical Business Practices

Suppliers shall:

- Comply with all applicable laws, regulations, and industry standards
- Conduct business with integrity, avoiding any form of corruption, bribery, or fraudulent practices
- Maintain accurate books and records
- Avoid conflicts of interest and report any potential conflicts to Airspace
- Protect confidential information and intellectual property
- Comply with competition and antitrust laws.

3.3 Transparent Governance and Compliance

Suppliers shall:

- Maintain transparent and accountable governance structures

- Ensure compliance with data protection and privacy regulations.

3.4 Environmental Stewardship

Suppliers shall ensure that sourcing and supply chain practices minimise environmental impact. This includes:

- Prioritising the sourcing of materials that are sustainable and have a lower environmental footprint
- Implementing practices to reduce emissions, waste, and resource consumption
- Complying with all applicable environmental regulations and standards.

4. Raising Concerns and Reporting Breaches

Airspace maintains a confidential reporting channel through a dedicated whistleblowing channel (rohanholdings.whistlelink.com). This approach is intended to safeguard whistleblower anonymity to the greatest extent possible. This reporting mechanism is available to all employees, suppliers and stakeholders for submitting concerns regarding unethical, inappropriate or illegal conduct. Airspace is fully committed to protecting individuals from retaliation when they report such concerns in good faith.

Suppliers must cooperate fully with any investigations initiated in response to reported concerns.

5. Governance

Senior management are responsible for overseeing this Code of Conduct and ensuring it remains up to date and aligned with the organisations legal and ethical obligations. They will review the Code at least biennially and amend it where necessary, with responsibility for its ongoing relevance and effectiveness.

Signed:



Jamie Rohan
Managing Director

Date:

3/09/26